

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts  
Southern District of Texas  
FILED

March 06, 2020

David J. Bradley, Clerk of Court

United States of America

v.

AARON WILLIS

Case No.

4:20mj0470

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 5, 2020 in the county of Galveston in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

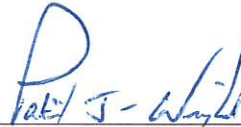
## Offense Description

18 U.S.C. Section 113(a)(4)

The defendant, within the special maritime and territorial jurisdiction of the United States, committed an assault by striking, beating, or wounding; Title 18, United States Code, Section 113 (a)(4).

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.

Complainant's signature

Patrick Wright, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/06/2020City and state: Houston, Texas

Judge's signature

Frances H. Stacy, Magistrate Judge

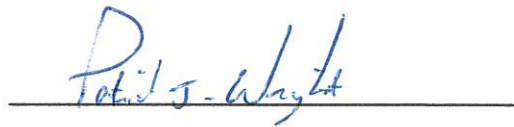
Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Patrick Wright, being duly sworn, depose and state:

1. I am a Special Agent, employed by the Federal Bureau of Investigation (FBI), and assigned to the Houston Division, Texas City Resident Agency. I have been an FBI Special Agent for over 12 years, and served as an Investigative Specialist with the FBI from 2002 to 2008. I am charged with the duty of investigating violations of the laws of the United States, collecting evidence in cases in which the United States is or may be a party in interest, and performing other duties imposed by law. During my employment with the FBI, I have investigated many cases involving crimes on the high seas, including aggravated assault cases. During my employment as a law enforcement agent, I investigated many cases involving assault. I have also participated in various FBI mandated and volunteer training for the investigation and enforcement of federal laws.
2. This Affidavit is made in support of a criminal complaint charging AARON WILLIS with violating 18 U.S.C. Section 113(a)(4), which makes it a crime to assault someone by striking, beating, or wounding.
3. I am familiar with the information contained in the Affidavit based upon the investigation I have personally conducted and my conversations with other parties involved in this case.
4. Because the Affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation, I have set forth only those facts that I believe are necessary to establish probable cause that evidence of a violation of 18 U.S.C. Section 113(a)(4) has been committed by Aaron Willis on or about March 5, 2020. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part.

5. On Friday, March 6, 2020, Carnival Cruise Lines Corporate Security Agent Robert Williams, Jr. contacted Affiant and relayed an incident that occurred on board the Carnival Vista Cruise Ship. Williams stated that on the previous day, Thursday, March 5, 2020, Vista Security Officers on board the ship were called to a disturbance in the area of Deck-10 aft Jacuzzi, starboard side, at approximately 7:35 P.M. There were reports that Aaron Willis (DOB 08-29-1977) had approached and confronted L.C., a minor male (DOB 10-15-2006), and proceeded to physically assault L.C. inside the Jacuzzi by striking, beating and wounding him. Additionally there were reports that Willis held L.C.'s head under water until he went limp.
6. Carnival personnel provided L.C. medical attention for his injuries, which included contusions to his neck and upper body.
7. The incident was witnessed by multiple passengers who provided written statements, and was captured on CCTV camera recording.
8. Based upon the information set forth above, I believe that probable causes exists for the issuance of a Criminal Complaint charging AARON WILLIS with a violation of 18 U.S.C. Section 113(a)(4), which makes it a crime to assault someone by striking, beating, or wounding.



Affiant, Patrick Wright, FBI SA

Sign and sworn to me via telephone on this 6th day of March, 2020.



Honorable Frances H. Stacy  
United States Magistrate Judge